

x:\tc52666\adoption

ROGER P. McTIERNAN, JR. (RPM 1680)  
BARRY, McTIERNAN & MOORE  
2 Rector Street – 14<sup>th</sup> Floor  
New York, New York 10006  
(212) 313-3600

Attorneys for Defendants STRUCTURE TONE, INC. s/h/a STRUCTURE TONE  
(UK), INC. and STRUCTURE TONE GLOBAL SERVICES, INC.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
IN RE LOWER MANHATTAN DISASTER SITE  
LITIGATION

-----X  
DALIA NAUTA AND LUIS NAUTO,

Plaintiffs,

-against-

**NOTICE OF  
ADOPTION**

**08 CV 01015**

**ON SITE:**

7 WORLD TRADE COMPANY, L.P.; A RUSSO WRECKING,  
INC.; ABM INDUSTRIES, INC.; ABM JANITORIAL NORTHEAST,  
INC.; AMEC CONSTRUCTION MANAGEMENT, INC.; AMEC  
EARTH & ENVIRONMENTAL, INC.; ANTHONY CORTESE  
SPECIALIZED HAULING LLC; ATLANTIC HEYDT CORP.;  
BECHTEL ASSOCIATES PROFESSIONAL CORPORATION;  
BECHTEL CONSTRUCTION, INC.; BECHTEL CORPORATION;  
BECHTEL ENVIRONMENTAL, INC.; BERKEL & COMPANY,  
CONTRACTORS, INC.; BIG APPLE WRECKING & CONSTRUCTION  
CORP.; BOVIS LEND LEASE LMB, INC.; BREEZE CARTING  
CORP.; BREEZE NATIONAL INC.; BRER-FOUR TRANSPORTATION  
CORP.; BURO HAPPOLD CONSULTING ENGINEERS, P.C.; C.B.  
CONTRACTING CORP.; CANRON CONSTRUCTION CORP.;  
CORD CONTRACTING CO., INC.; DAKOTA DEMO-TECH;  
DIAMOND POINT EXCAVATING CORP.; DIEGO CONSTRUCTION,  
INC.; DIVERSIFIED CARTING, INC.; DMT ENTERPRISE, INC.;  
D'ONOFRIO GENERAL CONTRACTORS CORP.; EAGLE LEASING  
& INDUSTRIAL SUPPLY, INC.; EAGLE ONE ROOFING  
CONTRACTORS INC.; EJ DAVIES, INC.; EN-TECH CORP.;  
EVERGREEN RECYCLING OF CORONA(EROC); EWELL W.  
FINLEY, P.C.; EXECUTIVE MEDICAL SERVICES, P.C.; FLEET  
TRUCKING, INC.; FRANCIS A. LEE EXTERIOR RESTORATION,  
INC.; FTI TRUCKING, INC.; GILSANZ, MURRAY & STEFICEK,



LLP, GOLDSTEIN ASSOCIATES CONSULTING ENGINEERS, PLLC; HALLEN WELDING SERVICE, INC.; H.P. ENVIRONMENTAL, KOCH SKANSKA INC.; LAQUILA CONSTRUCTION INC.; LASTRADA GENERAL CONTRACTING CORP.; LESLIE E. ROBERTSON ASSOCIATES CONSULTING ENGINEERS P.C.; LIBERTY MUTUAL GROUP; LOCKWOOD, KESSLER & BARTLETT, INC.; LUCIUS PITKIN, INC.; LZA TECH-DIV OF THORTON TOMASETTI; MANAFORT BROTHERS INCORPORATED; MAZZOCCHI WRECKING, INC.; HUDSON MERIDIAN CONSTRUCTION GROUP, LLC F/K/A MERIDIAN CONSTRUCTION CORP.; MORETRENCH AMERICAN CORP.; MRA ENGINEERING, PC; MUESER RUTLEDGE CONSULTING ENGINEERS, INC.; NACIREMA INDUSTRIES INCORPORATED; NEW YORK CRANE & EQUIPMENT CORP.; NICHOLSON CONSTRUCTION COMPANY; PETER SCALAMANDRE & SONS, INC.; PINNACLE ENVIRONMENTAL CORP.; PLAZA CONSTRUCTION CORP.; PRO SAFETY SERVICES LLC; PT & L CONTRACTING CORP.; ROBER SILMAN ASSOCIATES; ROBERT L. GEROSA, INC.; RODAR ENTERPRISES, INC.; ROYAL GM, INC.; SAB TRUCKING INC; SAFEWAY ENVIRONMENTAL CORP.; SEASONS INDUSTRIAL CONTRACTING ; SEMCOR EQUIPMENT & MANUFACTURING CORP.; SILVERITE CONTRACTING CORPORATION; SIMPSON GUMPERTZ & HEGER INC.; SKIDMORE, OWING & MERRILL LLP; SURVIVAIR; TISHMAN CONSTRUCTION CORPORATION OF MANHATTAN; TISHMAN CONSTRUCTION CORPORATION OF NEW YORK; TISHMAN INTERIORS CORPORATION; TISHMAN SPEYER PROPERTIES; THORTON-TOMASETTI GROUP, INC.; TORRETTA TRUCKING, INC.; TOTAL SAFETY CONSULTING, L.L.C.; TUCCI EQUIPMENT RENTAL CORP.; TULLY CONSTRUCTION CO., INC.; TURNER CONSTRUCTION COMPANY; ULTIMATE DEMOLITION/CS HAULING (JOINT VENTURE); VERIZON NEW YORK INC.; VOLLMER ASSOCIATES LLP; WEEKS MARINE, INC.; WEIDLINGER ASSOCIATES, CONSULTING ENGINEERS, P.C.; WHITNEY CONTRACTING INC.; WOLKOW-BRAKER ROOFING CORP.; WORLD TRADE CENTER PROPERTIES LLC; WSP CANTOR SEINUK; YANNUZZI & SONS, INC.; YONKERS CONTRACTING COMPANY, INC.; YORK HUNTER CONSTRUCTION, LLC; ZIEGENFUSS DRILLING, INC.,

OFF-SITE:

110 CHURCH LLC, 233 BROADWAY OWNERS, LLC, 50 TRINITY, LLC, 53 PARK PLACE LLC, 88 GREENWICH LLC, 90 CHURCH STREET LIMITED PARTNERSHIP, ALAN KASMAN DBA KASCO, AMBIENT GROUP, INC., ANN TAYLOR STORES CORPORATION, BANKERS TRUST COMPANY, BATTERY PARK CITY AUTHORITY, BELFOR USA GROUP, INC., BFP ONE LIBERTY PLAZA CO., LLC, BLACK DIAMONDS LLC, BLACKMON-MOORING-STEAMATIC CATASTROPHE, INC. D/B/A BMS CAT, BOSTON PROPERTIES, INC., BROADWAY



WEST STREET ASSOCIATES LIMITED PARTNERSHIP, BROOKFIELD FINANCIAL PROPERTIES, INC., BROOKFIELD FINANCIAL PROPERTIES, LP, BROOKFIELD PARTNERS, LP, BROOKFIELD PROPERTIES CORPORATION, BROOKFIELD PROPERTIES HOLDINGS INC., BT PRIVATE CLIENTS CORP., DEUTSCHE BANK TRUST COMPANY, DEUTSCHE BANK TRUST COMPANY AMERICAS, DEUTSCHE BANK TRUST CORPORATION, ENVIROTECH CLEAN AIR, INC., GENERAL RE SERVICES CORP., GPS ENVIRONMENTAL CONSULTANTS, INC., HIGHLAND DEVELOPMENT LLC, HILLMAN ENVIRONMENTAL GROUP, LLC, INDOOR ENVIRONMENTAL TECHNOLOGY, INC., KASCO RESTORATION SERVICES CO., LIONSHEAD 110 DEVELOPMENT LLC, LIONSHEAD DEVELOPMENT LLC, MERRILL LYNCH & CO., INC., NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC., NEW LIBERTY PLAZA LP, NEW YORK CITY INDUSTRIAL DEVELOPMENT AGENCY, NEW YORK CITY INDUSTRIAL DEVELOPMENT CORPORATION, NOMURA HOLDING AMERICA, INC., NOMURA SECURITIES INTERNATIONAL, INC., ONE LIBERTY PLAZA, STEEPLECHASE ACQUISITIONS LLC, STRUCTURE TONE (UK), INC., STRUCTURE TONE GLOBAL SERVICES, INC., THE BANK OF NEW YORK TRUST COMPANY NA, THE BOARD OF MANAGERS OF THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), TISHMAN INTERIORS CORPORATION, TISHMAN SPEYER PROPERTIES, TOSCORP INC., TUCKER ANTHONY, INC., TULLY CONSTRUCTION CO., INC., TULLY INDUSTRIES, INC., V CUCINIELLO, VERIZON NEW YORK, INC., WESTON SOLUTIONS, INC., WFP ONE LIBERTY PLAZA CO., L.P., WFP ONE LIBERTY PLAZA, CO. GP CORP., WFP TOWER A CO., WFP TOWER A CO. G.P. CORP., WFP TOWER A. CO., L.P., WFP TOWER B CO. G.P. CORP., WFP TOWER B HOLDING CO., LP, W, ET AL.

Defendants.


-----X

PLEASE TAKE NOTICE that defendants, STRUCTURE TONE, INC. s/h/a STRUCTURE TONE (UK), INC. and STRUCTURE TONE GLOBAL SERVICES, INC. (hereinafter "STRUCTURE TONE"), as and for their responses to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint filed in the above-referenced action, hereby adopts STRUCTURE TONE's Answer to the Master Complaint dated July 30, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

To the extent that STRUCTURE TONE's Answer to the Master Complaint does not comprehensively address any of the specific allegations within the Check-Off Complaint in the above-captioned matter, STRUCTURE TONE denies knowledge or information sufficient to form a belief as to the truth of such specific allegations.

WHEREFORE, STRUCTURE TONE, INC. s/h/a STRUCTURE TONE (UK), INC. and STRUCTURE TONE GLOBAL SERVICES, INC., demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York  
July 20, 2008



---

ROGER P. McTIERNAN, JR. (RPM 1680)  
BARRY, McTIERNAN & MOORE  
Attorneys for Defendants  
STRUCTURE TONE, INC. s/h/a  
STRUCTURE TONE (UK), INC. and  
STRUCTURE TONE GLOBAL SERVICES, INC.  
2 Rector Street – 14<sup>th</sup> Floor  
New York, New York 10006  
(212) 313-3600